

Exhibit GG

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

LAEARTHA BANKS and
ARIA LAMBERT, Each Individually
and on Behalf of all Others Similarly
Situated

PLAINTIFFS

v. Case No. 4:21-CV-429-JM
CENTENE MANAGEMENT COMPANY
and CENTENE CORPORATION

DEFENDANTS

**DEFENDANTS' MOTION TO DENY CONDITIONAL CERTIFICATION AND
DISMISS FLSA COLLECTIVE CLAIM PURSUANT TO FED. R. CIV. P. 12(c)**

Defendants Centene Management Company and Centene Corporation (collectively, “Centene”) move this Court for an Order denying conditional certification under the Fair Labor Standards Act (“FLSA”) and dismissing the FLSA collective action claim (Second Claim for Relief) from the Collective Action Complaint (Dkt. 1) pursuant to Rule 12(c) of the Federal Rules of Civil Procedure. Plaintiffs Laearth Banks (“Banks”) and Aria Lambert (“Lambert,” and with Banks, “Plaintiffs”) have not taken any action to pursue this case as a collective action, and they have missed the deadline for filing any motion for conditional certification. Plaintiffs have made no effort to seek an extension. Plaintiffs have abandoned their collective claims, and must be limited to moving forward with their individual claims only.

In support of its motion, Centene relies upon its contemporaneously filed supporting brief, which is incorporated herein by reference.

WHEREFORE, Centene Management Company and Centene Corporation move the Court for an Order denying conditional certification and dismissing the FLSA collective action claim (Second Claim for Relief) from the Collective Action Complaint (Dkt. 1).

Eva C. Madison (98183)
LITTLER MENDELSON, P.C.
217 E. Dickson Street, Suite 204
Fayetteville, AR 72701
Telephone: 479.582.6100
emadison@littler.com

Attorneys for Defendants
Centene Management Company and Centene
Corporation